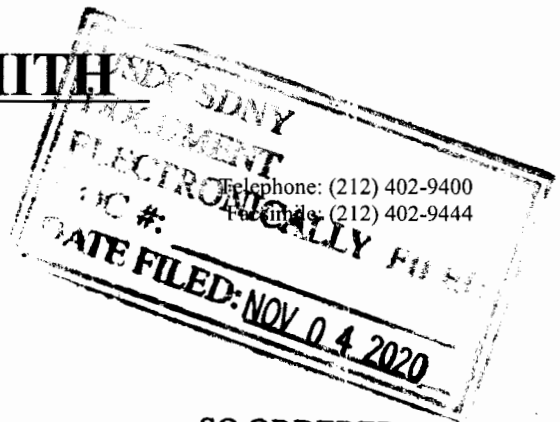


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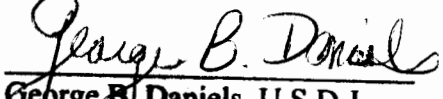
October 30, 2020



VIA ECF

The Honorable George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10009

SO ORDERED:


George B. Daniels, U.S.D.J.

Dated: NOV 04 2020

RE: *Virtu Financial, Inc. v. AXIS Insurance Co.*
No.: 1:20-cv-06293, Application for Order Allowing Redactions

Dear Judge Daniels:

We represent Plaintiffs Virtu Financial, Inc. and Virtu Americas, LLC. (collectively "Virtu") in the above-referenced case. I write pursuant to Your Honor's Individuals Rules of Practice respectfully to request an order allowing Virtu to redact certain sensitive information from its Reply in Support of Its Motion for Partial Summary Judgment (the "Reply").

Virtu's lawsuit concerns a claim for insurance coverage arising out of a computer systems fraud. Specifically, after a successful hacking campaign, one or more hackers took over the email account of a Virtu executive and, pretending to be the executive, directed Virtu's accounting department to transfer approximately \$10.8 million to two overseas accounts.

Like Virtu's Motion for Partial Summary Judgment, which the Court allowed Virtu to file in redacted form (D.I. 35), the Reply provides certain technical details that explain how the hackers were able to perpetrate the fraud. In the interest of preventing future similar frauds—not only of Virtu's computer systems but also of computer systems of other financial institutions—Virtu respectfully requests that the Court grant Virtu leave to redact this sensitive information.

Respectfully,



Robin L. Cohen

McKool Smith

A Professional Corporation • Attorneys

Austin | Dallas | Houston | Los Angeles | Marshall | New York | Washington, DC